

## **EXHIBIT D**



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*\*Admitted to Practice Law:  
California, Illinois, Michigan,  
New York, Ohio, & Washington DC*

September 25, 2007

*By Fax: 212-370-4453 and Email*

Marshall Turner  
Condon & Forsyth, LLP  
Times Square Tower  
7 Times Square  
New York, NY 10036

Re: All Nippon Airlines

Dear Marshall:

Responding to your letter of September 14, 2007 and deposition notices for various United employees, I can confirm deposition dates for Julio Hernandez and Ed Loh. Depositions would have to take place in San Francisco (not Los Angeles where you have noticed them), and preferably at or close to SFO. If you are a member of an airline club, perhaps a conference room there might be suitable. As for dates, while I cannot produce Hernandez on the date you selected (December 11, 2007), I can produce him on December 12 or 13, 2007. As for Loh, I can produce him on December 13 or 14, 2007. Please advise regarding your choice of dates and the San Francisco location.

With regard to the 3 pilot depositions, I will not be able to confirm a date for them until their December schedules are published in November. Additionally, since all three pilots are based in San Francisco, those depositions would also need to take place in San Francisco, not Los Angeles, as now noticed.

Finally, pursuant to Local Rule 37-1, I am requesting that within 7 days we meet and confer in an effort to resolve the dispute over your refusal to produce a PMK regarding the Ground Handling Agreement and documents relating thereto. Additionally, to the extent there remains any dispute regarding the scheduling of

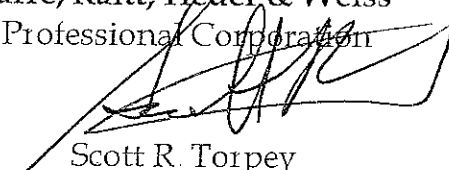
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the United witnesses addressed above, then consider this a request for a meet and confer relative to those issues as well.

Thank you for your anticipated cooperation.

Very truly yours,

Jaffe, Raitt, Heller & Weiss  
Professional Corporation



Scott R. Torpey

SRT/pln

c: Frank Silane (*by email*)  
Timothy Eskridge (*by email*)  
Rod Margo (*by email*)  
Scott Cunningham (*by email*)

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Bc: William D. Adams

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\*\*\* TX REPORT \*\*\*  
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Message: